

EXHIBIT A[Skip to Main Content](#) [Logout](#) [My Account](#) [Search](#) [Menu](#) [New Civil Search](#) [Refine Search](#) [Back](#)Location : Fort Bend [Help](#)**REGISTER OF ACTIONS**
CASE NO. 22-CCV-070378Richard P Jones & Michael Joseph Bitgood A/K/A Michael Easton vs
Marianna Sullivan, Imperial Lofts LLC, and Karina Martinez§
§
§
§Case Type: **Other Civil**
Date Filed: **01/07/2022**
Location: **County Court at Law 3**

PARTY INFORMATION

Defendant or
Respondent **Imperial Lofts LLC**
Houston, TX 77056**Attorneys**
David A. Oubre
Retained
713-659-6767(W)Defendant or
Respondent **Imperial Lofts Owner, LLC**
Leawood, KS 66206Defendant or
Respondent **Lewis Brisbois Bisgaard & Smith, LLP, a
California Foreign Entity**
Los Angeles, CA 90071Defendant or
Respondent **Martinez, Karina**
Houston, TX 77056**David A. Oubre**
Retained
713-659-6767(W)Defendant or
Respondent **Ogbureke, Chinasa**
Houston, TX 77046Defendant or
Respondent **Oubre, David**
Houston, TX 77046Defendant or
Respondent **Sullivan, Marianna**
Houston, TX 77056**David A. Oubre**
Retained
713-659-6767(W)Plaintiff or
Petitioner **Bitgood, Michael Joseph**
Richmond, TX 77406Plaintiff or
Petitioner **Easton, Michael**Plaintiff or
Petitioner **Jones, Richard P****Susan Cecilia Norman**
Retained
713-882-2066(W)Plaintiff or
Petitioner **Lewis Brisbois Bisgaard & Smith, LLP, a
Texas Domestic Partnership**
Houston, TX 77255**Susan Cecilia Norman**
Retained
713-882-2066(W)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS

01/07/2022 **Docket Sheet**
qc/dl/ig/jg/lb/pll/JH

01/07/2022 **Petition**
Plaintiff's Original Petition

01/07/2022 **Petition**
Plaintiffs' Amended Petition (STC 01/10/2022 SM)

01/07/2022 **Jury Demand**
PG. 8

01/10/2022 **Motion (No Fee)**
Motion to Disqualify Hoover Slovacek LLP

01/10/2022 **Request**
Request for preservation of electronic evidence

01/12/2022 **Citation**
Imperial Lofts qc/dl

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01/12/2022	Citation Imperial Lofts LLC	Unserved
01/12/2022	Citation Karina Martinez qc/dl	
01/12/2022	Citation Martinez, Karina	Unserved
01/12/2022	Citation Marianna Sullivan qc/dl	
01/12/2022	Citation Sullivan, Marianna	Unserved
01/13/2022	Filing Service of Citation on agents/lawyers as requested	
02/22/2022	Notice Notice to the Court of "logjam" in lower court	
03/02/2022	Letters NOTICE OF OVERDUE ANSWER TO DEFENDANT'S COUNSEL PRE-DEFAULT	
03/08/2022	Application Application for entry of default judgment against Imperial Lofts LLC & Severance of Martinez and Sullivan	
03/08/2022	Notice of Hearing	
03/11/2022	Answer/Response Defendants' Original Answer and Jury Demand (STC 3/14/2022 MM)	
03/14/2022	Notice Notice of Passing Hearing	
03/14/2022	Filing LETTER TO INCOMING LAWYERS, IN RE: AFFIRMATIVE DEFENSES	
03/21/2022	Notice NOTICE OF SERVICE OF WRITTEN DISCOVERY	
03/21/2022	Motion on Judgment Defendants' No-Evidence Motion for Summary Judgment (STC 3/23/22 cmc)	
03/21/2022	Proposed Order Proposed Order (STC 3/23/22 cmc)	
03/22/2022	Motion (No Fee) MOTION FOR SANCTIONS (CARRIED WITH THE CASE)	
03/23/2022	Filing REQUEST TO COUNSEL TO CONFER ON A POTENTIALLY CONTESTED ISSUE	
03/23/2022	Notice of Hearing Notice of Oral Hearing	
03/24/2022	Motion (No Fee) Motion to Disqualify Lewis Brisbois Bisgaard & Smith LLP, and David A. Oubre	
03/24/2022	Motion on Judgment Defendants' First Amended No-Evidence Motion for Summary Judgment	
03/24/2022	Proposed Order Order on First Amended No-Evidence MSJ (stc 03/25/22 mr)	
03/24/2022	Notice of Hearing Notice of Oral Hearing	
03/24/2022	Letters LETTER TO COUNSEL, IN RE: VIOLATIONS OF DR'S AND CONFLICTS	
03/24/2022	Notice of Hearing Notice of Oral Hearing	
04/11/2022	Request Request for judicial notice pursuant to Rule 201 TRE	
04/11/2022	Subpoena - Civil/Family/Probate NOTICE OF SIGNED STIPULATION BY MARIANA SULLIVAN IN RE SUBPOENA DUCES TECUM	
04/11/2022	Subpoena - Civil/Family/Probate NOTICE OF SIGNED STIPULATION BY KARINA MARTINEZ IN RE SUBPOENA DUCES TECUM	
04/11/2022	Request Request for Court Reporter to Make a Record	
04/13/2022	Notice NOTICE OF PLAINTIFF'S DISCLOSURES TO DEFENDANTS	
04/14/2022	Notice NOTICE OF FILING OF AMENDED DISCLOSURES/IN RE: BRICE BEALE, IMPERIAL LOFTS	
04/18/2022	Request REQUEST FOR JUDICIAL NOTICE OF PARALLEL PROCEEDINGS IN COURT # 4	
04/19/2022	Notice NOTICE OF CONSTABLE'S SERVICE & RETURN ON DANIEL SWIFT EDMUNDS	
04/21/2022	Subpoena - Civil/Family/Probate Notice of Unsigned Stipulation by Daniel Edmunds in Re Subpoena qc/rc/JH	
04/22/2022	Answer/Response Objections to, response to and motion for a continuance to Defendant's no evidence motion for summary judgment (stc 4.27.22 jg)	
04/25/2022	Motion (No Fee) Defendants Motion to Quash Subpoena Served to Mr. Daniel Edmunds and Motion for Entry of Protective Order	
04/25/2022	Proposed Order (stc 4/26/22 vp)(stw 5/3/2022 nc)	
04/25/2022	Motion (No Fee) Defendant Karina Martinez's Motion to Quash and Motion for Entry of Protective Order	
04/25/2022	Proposed Order (stc 4/26/22 vp) (stw 5/3/2022 nc)	
04/25/2022	Motion (No Fee) Defendant Marianna Sullivan's Motion to Quash and Motion for Entry of Protective Order.	
04/25/2022	Proposed Order (stc 4/26/22 vp)(stw 5/3/2022 nc)	
04/25/2022	Answer/Response Defendants' Response In Opposition to Plaintiffs' Request for Judicial Notice	
04/25/2022	Proposed Order stc 4/26/2022 nc	

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04/25/2022	Answer/Response Defendants' Response to Plaintiffs' Request for Judicial Notice
04/25/2022	Proposed Order Order denying Plaintiff's request for judicial notice(STc 04/26/2022 nc)
04/25/2022	Answer/Response Defendants' Response to Plaintiffs' Motion for Sanctions Against Defendants and David A. Oubre
04/25/2022	Proposed Order stc 4/25/2022 nc(stw 5/3/2022 nc)
04/25/2022	Notice Notice of Judicial Confession by Imperial Lofts
04/26/2022	Proposed Order WARRANT/ATTACHMENT FOR KARINA MARTINEZ(stc 4/26/2022 nc)
04/26/2022	Proposed Order Warrant/Attachment for Madam Sullivan(stc 4/26/2022 nc)
04/26/2022	Proposed Order WARRANT/ATTACHMENT FOR DANIEL EDMUNDS(stc 4/26/2022 nc)
04/26/2022	Notice NUNC-PRO-TUNC-NOTICE OF JUDICIAL CONFESSION
04/26/2022	Notice NOTICE OF INTENT TO SEEK WRITS OF ATTACHMENT
04/26/2022	Notice NOTICE OF POSSIBLE SETTLEMENT OF ALL CLAIMS AND CASES
04/28/2022	Transfer Court to Court QC/cmc/JH
04/29/2022	Petition (No OCA) Plaintiff 2nd amended (stw 5/2/2022 nc)
05/03/2022	CANCELED M/Summary Judgment (1:30 PM) (Judicial Officer McMeans, Jeffrey) Passed Motion for Sanctions under Rule 13 and Chapter 10.
05/13/2022	Notice (Service) NOTICE TO OPPOSING COUNSEL UNDER TRD 3.08 (A) AND REBUTTAL TO TEX. P. CODE 42.07
05/16/2022	Motion (No Fee) MOTION TO SHOW AUTHORITY UNDER RULE 12
05/18/2022	Filing REQUEST TO OUBRE TO COMPLY WITH RULE 12
05/20/2022	Answer/Response Objections to request for admissions (STW 05/24/2022 SM)
05/20/2022	Objection - Civil (stw 05/23/2022 pl)
06/09/2022	Answer/Response RESPONSE TO JUNE 3 EMAIL REQUESTING PRODUCTION FROM CHINASA OGBUREKE, Esq. WHILE RULE 12 IS PENDING
06/14/2022	Answer/Response Defendants' Response to Plaintiffs' Motion to Show Authority w/ Exhibits and Proposed Order
06/15/2022	Proposed Order (06/15/2022 nc)
06/15/2022	Petition PLAINTIFF'S 3RD AMENDED PETITION for DECLARATORY AND INJUNCTIVE RELIEF.
06/21/2022	Answer/Response Plaintiff's Amended Reply to the Defendant's Response to the Motion to Show Authority
06/21/2022	Answer/Response Plaintiffs REPLY TO DEFENDANT'S RESPONSE TO The MOTION TO SHOW AUTHORITY
06/22/2022	Request REQUEST FOR CITATIONS FOR DAVID OUBRE, AND CHINASA OGBUREKE--EXPEDITED
06/23/2022	Application Application for Entry of Partial Default & Severance
06/23/2022	Jury Demand (stw 06/24/2022 rc)
06/24/2022	Jury Fee Paid
06/24/2022	Motion (No Fee) MOTION TO STRIKE JP COURT JURY DEMAND AND REQUEST FOR JUDICIAL NOTICE OF A VOLUNTARY APPERANCE
06/24/2022	Petition (No OCA) PLAINTIFF'S FOURTH AMENDED PETITION JOINING IMPERIAL LOFTS OWNER LLC, AND LEWIS, BRISBOIS, BISGAARD & SMITH LLP, (A CALIFORNIA FOREIGN ENTITY)
06/24/2022	Request
06/27/2022	Citation
06/27/2022	Citation Imperial Lofts Owner, LLC Unserved
06/27/2022	Proposed Order ORDER (stw 06/28/22 pc)
06/30/2022	Citation David Oubre
06/30/2022	Citation Oubre, David Unserved
06/30/2022	Citation Chinasa Ogrureke
06/30/2022	Citation Ogbureke, Chinasa Unserved
07/01/2022	Citation Imperial Lofts Unserved
07/01/2022	Citation Imperial Lofts Owner, LLC Served 07/18/2022
07/01/2022	Filing REQUEST TO COUNSEL
07/08/2022	Answer/Response Defendants' Amended Response to Plaintiffs' Motion to Show Authority and Exhibits A-F

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07/08/2022	Proposed Order Proposed Order - Defendants' Amended Response to Plaintiffs' Motion to Show Authority(stw 7/14/2022 nc)
07/11/2022	Answer/Response Reply to Defendant's "amended" response to Plaintiff's Motion to show authority.
07/11/2022	Answer/Response ON MOTIONS
07/11/2022	Motion (No Fee) MOTION TO STRIKE THE "AFFIDAVITS" OF LARSON, SULLIVAN, AND MARTINEZ
07/12/2022	Motion (No Fee) REPLY TO DEFENDANT'S SECOND TIME FILING TO PLAINTIFF'S RULE 12 MOTION
07/12/2022	Motion (No Fee) Plaintiff's Reply to Defendants Amended + Amended Response to the Motion to Show Authority
07/13/2022	Motion (No Fee) Defendants Motion to Compel Plaintiff's Discovery Responses
07/13/2022	Proposed Order P.O Defendants Motion to Compel Plaintiff's Discovery Responses
07/13/2022	Motion (No Fee) Defendants Motion to Compel Plaintiff, Bitgood's Deposition
07/13/2022	Proposed Order Proposed Order Motion to Compel Plaintiff, Bitgood's Deposition
07/13/2022	Motion (No Fee) Defendants Motion to compel Bitgood to Cease Communications
07/13/2022	Proposed Order Motion to Compel Plaintiff Bitgood to Cease Communications
07/13/2022	Motion (No Fee) Motion for Entry of Docket Control Order
07/13/2022	Proposed Order Proposed Order Granting Entry of DCO
07/18/2022	Request REQUEST FOR ADA ACCOMODATION UNDER FEDERAL LAW
07/18/2022	Notice Notice of Oral Hearing
07/19/2022	Motion for Dismissal Motion to Dismiss (Chapter 27)
07/20/2022	Proposed Order Order (Proposed - granting Chapter 27 Motion to Dismiss) (stw 07/21/2022 rc)
07/20/2022	Motion (No Fee) Amended Motion to Compel Plaintiff, Michael Bitgood to Cease Communications
07/21/2022	Answer/Response Defendants' Second Amended Response to Plaintiffs' Motion to Show Authority
07/21/2022	Proposed Order Proposed Order on Defendants' Second Amended Response to Plaintiffs' Motion to Show Authority (stw 07/22/22 pc)
07/22/2022	Answer/Response PLAINTIFF'S REPLY TO DEFENDANT'S SECOND AMENDED RESPONSE TO THE MOTION TO SHOW AUTHORITY.
07/25/2022	Request REQUEST FOR COURT REPORTER IN ALL PROCEEDINGS BEFORE THE ASSOCIATE JUDGES AND RENEWED REQUEST FOR ADA ACCOMODATION UNDER TITLE 42
07/26/2022	Letters REFLING OF LETTER TO COURT COORDINATOR, IN RE PENDING MOTIONS, AND ADA REQUEST (stac 07/29/2022 rc)
07/27/2022	Letters NOTICE OF SETTING AND AGREEMENT ON PENDING MOTIONS
08/16/2022	Answer/Response LETTER PLEADING RESPONDING TO ALL DEFENSE MOTIONS, AND 4TH REQUEST FOR AN ADA ACCOMODATION. (STW 8/17/2022 MM)
08/17/2022	Filing Time Line and Chronology
08/17/2022	Dismissed by Plaintiff/Non-Suit/Non-Final CHINASA OGUBUREKE
08/18/2022	Request JUDICIAL NOTICE OF THE REPREHENSIBLE CONDUCT OF DAVID OUBRE AND BRICE BEALE (stw 08/23/22 pc)
08/22/2022	Order signed 8/19/22 qc/vp/JH
08/22/2022	Filing First Supplement to Motion to DQ w Ex A
08/22/2022	Officers Return RETURN OF SERVICE ON IMPERIAL LOFTS OWNER LLC
08/22/2022	Notice ORDER ASSIGNING JUDGE LEWIS WHITE TO THE ENTIRE CASE
08/22/2022	Notice NOTICE OF TIME CHANGE OF HEARING
08/23/2022	Notice NOTICE OF INTENT TO ENFORCE RULE 11 AGREEMENT
08/29/2022	Answer/Response Defendant's Response to Plaintiff, Michael Joseph Bitgood's Motion to Dismiss (STAC 8/30/2022 MM)
08/29/2022	Proposed Order Order (STAC 8/30/2022 MM)
08/29/2022	Answer/Response Original Answer to Plaintiffs' Fourth Amended Petition (STAC 8/30/2022 MM)
08/30/2022	CANCELED M/Compel (9:00 AM) (Judicial Officer White, Lewis) Other
08/30/2022	Other Hearing (1:30 PM) (Judicial Officer White, Lewis)
08/30/2022	Exhibit Bitgood Exhibit 2
08/30/2022	Proposed Order Order (proposed on Bitgood's Chapter 27 motion) (STAC 8/30/2022 MM)

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08/30/2022	Notice of Appeal NOTICE OF APPEAL PURSUANT TO 51.014 (12)
08/31/2022	Notice NOTICE WITHDRAWING NOTICE OF APPEAL QC JH
08/31/2022	Filing Email from Michael Easton withdrawing Notice of Appeal qc/sm/JH
08/31/2022	Filing Email from Michael Easton qc/sm/JH
08/31/2022	Filing Email from Michael Easton qc/sm/JH
09/06/2022	Answer/Response Defendants' Supplemental Response to Plaintiff, Michael Bitgood's Motion to Dismiss (STW 9/7/2022 MM)
09/06/2022	Proposed Order Order (STW 9/7/2022 MM)
09/06/2022	Proposed Order (STW 9/7/2022 MM)
09/07/2022	Answer/Response Defendants' First Amended Original Answer and Jury Demand (STW 9/9/2022 MM)
09/07/2022	Answer/Response Def. 2nd Suppl. Resp. to Plaintiff. Mtn to Show Authority, Mtn. to Disqualify LBBS, and Mtn. to Strike (STW 9/9/2022 MM)
09/07/2022	Proposed Order Order (STW 9/9/2022 MM)
09/08/2022	Answer/Response Third Supplemental Response (STW 9/9/2022 MM)
09/08/2022	Report STATUS REPORT FOR 9/13/2022/
09/12/2022	Answer/Response Answer/Response (stw 09/13/22 pc)
09/12/2022	Exhibit Bitgood Exhibit 2-A (STC 9/13/2022 MM)
09/12/2022	Proposed Order Order (Proposed - Chapter 27 Motion) (STC 9/13/2022 MM)
09/13/2022	Bench Trial (1:30 PM) (Judicial Officer White, Lewis) RULE 12, SLAP MTN, COMPELL COMMUNICATION AND DOCKET CONTROL ORDER
09/13/2022	Order Signed 9/13/2022 QC JH
09/13/2022	Order Taking Judicial Notice - Signed 9/13/2022 QC JH
09/14/2022	Proposed Order Order (Proposed on Chapter 27 motion) (stw 9/15/2022 mem)
09/16/2022	Notice JUDICIAL NOTICE OF JANA LUBERT'S THREATS TO THE SOVEREIGNTY OF THE TEXAS COURTS
09/19/2022	Judge Docket Entry Rule 12 motion Granted LW
09/19/2022	Request REQUEST FOR COMPLIANCE WITH THE TEXAS RULES OF PROCEDURE, DISCOVERY, DISCIPLINE, ETHICS, AND DECENCY (stw 9/21/2022 mvc)
09/19/2022	Petition (No OCA) PTF'S SUPPLEMENT TO THE 4TH AMENDED PETITION (FILED JUNE 24TH 2022)
09/20/2022	Appearance David A. Oubre and Lewis Brisbois's Special Appearance for Appeal to Referring Court (incl. Exs. 1-3)
09/20/2022	Notice Nominal Defendants' Appeal of Associate Judge's Decision
09/21/2022	Notice of Appeal NOTICE OF APPEAL UNDER CPRC 54.01 (B) (12)
09/21/2022	Answer/Response Defendants Answer to Fourth Amended Petition (stw 09/21/2022 mr)
09/22/2022	Notice of Appeal AMENDED NOTICE OF APPEAL AND DESIGNATION OF RECORD PURSUANT TO CPRC 51.014 (b) (12)
09/22/2022	Motion (No Fee) "SOFT" OBJECTIONS/MOTION TO STRIKE THE DEFENDANT'S "ORIGINAL" ANSWER
09/26/2022	Notice to Court of Appeals
09/26/2022	Appeal Electronic Confirmation QC/SG
09/26/2022	Answer/Response RESPONSE TO RELATED SPECIAL APPEARANCE (stw 09/27/22 mr)
09/26/2022	Answer/Response RESPONSE TO DEFECTIVE AND UNCURABLE NOTICE OF APPEAL TO THE REFERRING COURT (stw 09/27/22 mr)
09/26/2022	Answer/Response RESPONSE TO FRIVOLOUS APPEAL TO THE REFERRING COURT/INVITED ERROR DOCTRINE (stw 09/27/22 mr)
09/26/2022	Proposed Order Order Affirming Associate Judge (stw 9/27/2022 mem)
09/27/2022	Letter from Clerk Designation Letter
09/27/2022	Notice Notice of Overdue Findings and Conclusions
09/27/2022	Findings of Fact and Conclusions of Law Signed 9/27/2022 QC/MM/JH
10/03/2022	Request REQUEST FOR A SUPPLEMENTAL CLERK'S RECORD
10/03/2022	Letters From court of appeals QC JH
10/04/2022	Notice Nominal Defendants' Appeal of Associate Judge's Decision of September 27, 2022

EXHIBIT A

10/06/2022	CounterClaim/CrossAction/Interpleader/Intervention/Third-Party Nominal Defendants David Oubre and Lewis Brisbois Bisgaard & Smith, LLP's Original Counterclaim
10/10/2022	Notice <i>NOTICE OF LACK OF STANDING BASED ON MOOTNESS BY LAWYERS CALLING THEMSELVES "NOMINAL DEFENDANTS"!</i>
10/11/2022	Notice
11/29/2022	M/Hearing (11:00 AM) (Judicial Officer Mathew, Juli A.) Nominal Defendants Appeal of the Associate Judge's Decision

FINANCIAL INFORMATION

Attorney Oubre, David A.			
Total Financial Assessment			5.00
Total Payments and Credits			5.00
Balance Due as of 10/16/2022			0.00
06/24/2022	Transaction Assessment		5.00
06/24/2022	Mail Payment	Receipt # 2022-08601-CCLK	(5.00)
Defendant or Respondent Imperial Lofts Owner, LLC			
Total Financial Assessment			5.00
Total Payments and Credits			5.00
Balance Due as of 10/16/2022			0.00
08/30/2022	Transaction Assessment		5.00
08/30/2022	E-filing	Receipt # 2022-11985-CCLK	(5.00)
Defendant or Respondent Lewis Brisbois Bisgaard & Smith, LLP, a California Foreign Entity			
Total Financial Assessment			80.00
Total Payments and Credits			80.00
Balance Due as of 10/16/2022			0.00
10/10/2022	Transaction Assessment		80.00
10/10/2022	E-filing	Receipt # 2022-14088-CCLK	(35.00)
10/10/2022	State Credit		(45.00)
Plaintiff or Petitioner Easton, Michael			
Total Financial Assessment			8.00
Total Payments and Credits			8.00
Balance Due as of 10/16/2022			0.00
06/27/2022	Transaction Assessment		8.00
06/27/2022	E-filing	Receipt # 2022-08674-CCLK	(8.00)
Plaintiff or Petitioner Jones, Richard P			
Total Financial Assessment			390.00
Total Payments and Credits			390.00
Balance Due as of 10/16/2022			0.00
01/07/2022	Transaction Assessment		374.00
01/07/2022	E-filing	Receipt # 2022-00322-CCLK	(237.00)
01/07/2022	State Credit		(137.00)
06/23/2022	Transaction Assessment		16.00
06/23/2022	E-filing	Receipt # 2022-08488-CCLK	(16.00)